

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
(EASTERN DIVISION)**

TS Merchandising Ltd., a British Virgin Islands corporation, and TS Production LLC, a Hungarian limited liability company,

Plaintiffs,

vs.

Dan and Loretta Hollings, Arizona residents, and Web Services, LLC, an Arizona limited liability company,

Defendants.

Case No. 07 C 6518

(Assigned to the Hon. Ronald A. Guzman)

Initial Status Hearing Date: February 11, 2008

Initial Status Hearing Time: 9:30am

INITIAL STATUS REPORT

Pursuant to the court's Order, filed 11/28/07, the parties (with Defendants appearing by way of special appearance without waiving any defenses relating to jurisdiction), by and through undersigned counsel, hereby submit this initial status report.

Compliance with Fed. R. Civ. P. 26(f)

Prior to the commencement of this action, the parties discussed the claims alleged in the Complaint and considered resolution of their dispute, but were unsuccessful. In compliance with Federal Rule of Civil Procedure 26(f), undersigned counsel have had an opportunity to discuss the nature and basis of the claims and defenses in this matter and the possibility for a prompt settlement or resolution of this case. The parties are both open to further settlement discussions.

Proposed Discovery Plan

Defendants have filed a motion to dismiss this case for lack of jurisdiction. The parties have agreed to a stay of discovery on the merits until the court rules on the motion to dismiss and will file an agreed motion with the Court seeking to stay discovery on the merits and vacate the initial status conference scheduled for February 11, 2008. The parties request that the Court set a

status hearing to a date at least 30 days after a ruling on Defendants' motion to dismiss, with the parties to file a proposed discovery plan three business days before any scheduled hearing.

In the event that the court does not grant the parties' agreed motion to stay discovery and vacate the initial status hearing, the parties submit the following proposed discovery plan for the court's consideration:

1. The parties shall exchange Initial Disclosures as defined in Federal Rule of Civil Procedure 26(a) no later than **March 10, 2008**.

2. Motions pursuant to Rule 12(b) of the Federal Rules of Civil Procedure, motions to amend the complaint and motions to join additional parties shall be filed no later than **March 17, 2008**.

3. The parties shall disclose their expert witnesses and reports no later than **September 22, 2008**. Rebuttal experts, if any, shall be disclosed no later than **October 13, 2008**.

4. All discovery, including depositions of parties, witnesses, and experts, answers to interrogatories, supplements to interrogatories, requests for admissions and requests for production of documents must be completed by **November 3, 2008**.

5. Supplemental disclosures and discovery responses shall thereafter be made as required by Rule 26(e) of the Federal Rules of Civil Procedure.

6. All dispositive motions shall be filed no later than **November 24, 2008**.

7. The parties request that the Court set a status hearing upon resolution of all dispositive motions. In the event no dispositive motions are filed, the parties request that the Court set a status hearing upon the passing of the dispositive motion deadline. At the status hearing, deadlines will be set for the filing of the Joint Proposed Pretrial Order and all Motions in Limine. A Final Pretrial Conference and a firm Trial date will also be set at the status hearing

RESPECTFULLY SUBMITTED this 6th day of February 2008.

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I hereby certify that on February 6, 2008, I electronically transmitted the attached document to the Clerk's office using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

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COPY of the foregoing and Notice of Electronic Filing
hand-delivered on February 7, 2008, to:

Honorable Ronald A. Guzman
United States District Court
Everett McKinley Dirksen Building
219 S. Dearborn Street, Room 1278
Chicago, IL 60604

By: s/ Betty Rios